

MEMO ENDORSED

ZEICHNER ELLMAN & KRAUSE LLP

575 LEXINGTON AVENUE
NEW YORK, NEW YORK 10022

(212) 223-0400
FAX: (212) 753-0396
www.zeklaw.com

35 MASON STREET
GREENWICH, CT 06830
(203) 622-0900
FAX: (203) 862-9889

103 EISENHOWER PARKWAY
ROSELAND, NJ 07068
(973) 618-9100
FAX: (973) 364-9960

DIRECT DIAL
(212) 826-5313

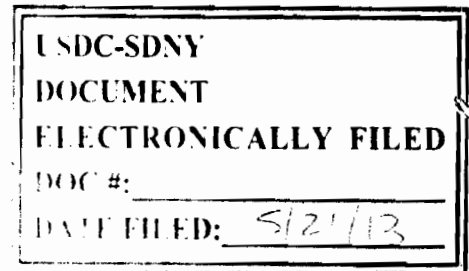
bleinbach@zeklaw.com

May 20, 2013

BY EMAIL

Hon. Ronnie Abrams, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Abrams_NYSDChambers@nysd.uscourts.gov



Maglificio Valda, S.P.A. v. Toscano Inc. and PYA USA, Inc., Case No. 13-1786 (RA)
(Second Request for Extension of Time)

Dear Judge Abrams:

This firm represents defendants Toscano Inc. and PYA USA, Inc. (collectively, "Defendants") in the above-referenced action. We respectfully request a 14-day extension of Defendants' time to answer or otherwise respond to plaintiff's complaint. Such extension would be from May 23, 2013 to June 6, 2013. This is Defendants' second request for an extension of time.¹ Plaintiff's counsel, Evan Michailidis, has agreed to this extension of time.

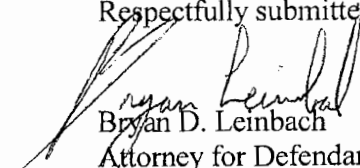
Plaintiff's complaint concerns contracts to sell designer clothing between plaintiff, an Italian company, and Defendants, who, upon information and belief, were incorporated in Delaware and Virginia. Since Defendants' first request to the Court for an extension of time, we have been in contact with plaintiff's counsel and have arranged a meeting to discuss the facts of plaintiff Valda's claims, the facts of Defendants' potential counterclaims, and settlement. This meeting between counsel and principals is currently scheduled for May 30, 2013. The parties need the additional extension of time so we may focus our attention on compiling information for that settlement meeting.

¹ By Memo Endorsement filed on April 8, 2013, the Court granted Defendants' first request and extended Defendants' time to answer or otherwise respond to plaintiff's complaint from April 8, 2013 to May 23, 2013.

ZEICHNER ELLMAN & KRAUSE LLP

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Respectfully submitted,



Bryan D. Leinbach
Attorney for Defendants

cc: Evan Michailidis, Esq. (by email)
Attorneys for Plaintiff

APPLICATION GRANTED
SO ORDERED



RONNIE ABRAMS, U.S.D.J.

5/21/13



Maglificio Valda, S.P.A. v. Toscano Inc. and PYA USA, Inc., Case No. 13-1786 (RA) -
Defendants' Request for Extension of Time

Bryan D. Leinbach

to:

'Abrams_NYSDChambers@nysd.uscourts.gov'

05/20/2013 12:54 PM

Cc:

""Michailidis, Evangelos"", "Yoav M. Griver"

Hide Details

From: "Bryan D. Leinbach" <BLEinbach@zeklaw.com>

To: ""Abrams_NYSDChambers@nysd.uscourts.gov""

<'Abrams_NYSDChambers@nysd.uscourts.gov'>

Cc: ""Michailidis, Evangelos"" <EMichailidis@duanemorris.com>, "Yoav M. Griver"

<YGriver@zeklaw.com>

3 Attachments



image001.jpg image002.jpg May 20, 2013 Letter to Hon Ronnie Abrams, U.S.D.J..pdf

Dear Judge Abrams:

This firm was retained to represent defendants Toscano Inc. and PYA USA, Inc. in the above-referenced action. Per the Court's Individual Rules 1A and 1D, attached please find defendants' second letter request for an extension of time to answer or otherwise respond to plaintiff's complaint. Plaintiff's counsel, Evan Michailidis as agreed the extension of time set forth in the attached letter.

Respectfully submitted,
Bryan D. Leinbach

Bryan D. Leinbach, Esq.
Zeichner Ellman & Krause LLP

575 Lexington Avenue
New York, New York 10022
Tel. (212) 826-5313
Fax (212) 753-0396
bleinbach@zeklaw.com

ZEK